



OTTcommunications

January 14, 2016

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: CC Docket No. 02-60  
Comments on Petition for Rulemaking Filed by Schools, Health &  
Libraries Coalition, et al., Seeking Further Modernization of the Rural  
Health Care Program**

Dear Ms. Dortch:

Attached please find the Comments of Pine Tree Telephone LLC, Saco River Telephone LLC, Mid-Maine Telephone LLC, Mid-Maine Telplus LLC, CRC Communications LLC, Granby Telephone LLC, Shoreham Telephone LLC, and War Telephone LLC, collectively d/b/a OTT Communications, in response to the Schools, Health, Libraries Coalition et al. Joint Petition for Rulemaking in CC Docket No. 02-60.

If you have any questions or concerns, you may reach me at (207) 992-9920 or [trina.bragdon@ottcommunications.com](mailto:trina.bragdon@ottcommunications.com).

Sincerely,

Trina M. Bragdon  
General Counsel  
OTT Communications

cc: Bob Froberg (via email)

OTT communications  
900D Hammond Street  
Bangor, Maine 04401

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Wireline Competition Bureau	)	CC Docket No. 02-60
Invites Comments on Petition	)	
for Rulemaking Filed by	)	
Schools, Health & Libraries	)	
Broadband Coalition, et al.,	)	
Seeking Further	)	
Modernization of the Rural	)	
Health Care Program	)	

**COMMENTS OF OTT COMMUNICATIONS**

**I. INTRODUCTION AND SUMMARY**

Pine Tree Telephone LLC, Saco River Telephone LLC, Mid-Maine Telecom LLC, Mid-Maine Telplus LLC, CRC Communications LLC, Granby Telephone LLC, Shoreham Telephone LLC, and War Telephone LLC, collectively d/b/a OTT Communications (“OTT”) hereby submits these comments in response to the Schools, Health, Libraries Coalition (“SHLB”) et al. joint Petition for Rulemaking (“Petition”),<sup>1</sup> which seeks to further modernize the Rural Health Care Program (“RHC Program”).

OTT supports the SHLB’s request that the Commission open a Rulemaking to review and modernize the RHC Program. As both rural incumbent local exchange carriers (“RLECs”) and competitive local exchange carriers (“CLECs”) that serve rural Maine, Massachusetts, New Hampshire, Vermont, and West Virginia, OTT Communications believes that we should take

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<sup>1</sup> *Wireline Competition Bureau Invites Comments on Petition for Rulemaking Filed by Schools, Health & Libraries Broadband Coalition, et al., Seeking Further Modernization of the Rural Health Care Program*, CC Docket No. 02-06, DA 15-1424 (rel. Dec. 15, 2015), (“Petition”).

advantage of modern technology to meet the need for our rural customers to access quality health care. We also believe that the RHC Program should be reviewed within the context of the totality of all universal service programs in order to maximize existing resources and networks while avoiding unnecessary duplication and waste.

## **II. COMMENTS**

OTT participates in federal and state universal service programs in numerous ways. We provide Lifeline service to our ILEC customers, we provide broadband service to both our ILEC and CLEC customers through the Schools and Library program, and we have improved our network (including expanding broadband services) through use of the High Cost fund. We believe in the fundamental goals of the universal service program – to make communications services available to all people, especially persons who live in rural areas or who have low incomes, and to make high-speed internet available to our nation’s school, libraries, and health care facilities. We understand, and agree with the SHLP, that robust broadband connections will facilitate better health for rural patients. We also recognize that demographic, economic, and social trends disproportionately impact rural communities – we live and work in these communities. SHLB’s list of rural risk factors for health paints a bleak, but accurate, picture of the realities of living in rural America.

We concur with the comments of the National Telecommunications Carriers Association – The Rural Broadband Association (NTCA) which urge the Commission to adopt a data-driven analytical approach which leverages rural broadband providers’ successes in order to target resources where they are most needed. In addition, the Commission should ensure coordination between the various universal service programs by assessing the impacts of the proposed reforms

on all universal service programs. In this way, the Commission can maximize the “bang for the buck” it gets from the public resources devoted to programs such as Rural Healthcare.

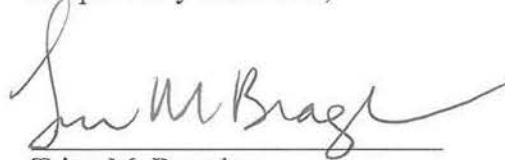
Rural carriers, like OTT Communications, have worked diligently to bring advanced connections to local, rural healthcare providers (RCPs) and their patients. To the extent that the obstacle facing RCPs is affordability, rather than availability, the Commission should focus its efforts on addressing that issue. By helping individual RCPs identify all the resources available to them, including existing assets and facilities provided by rural carriers, all parties benefit – RCPs, their patients, and the network providers.

OTT specifically supports the SHLB’s request that the Commission formally explore whether it can provide additional funding to increase the quality and availability of remote patient monitoring. As pointed out by the SHLB, rural hospitals face steep challenges in meeting the needs of their patient populations. Remote patient monitoring allows healthcare providers to manage chronic conditions and post-hospitalization recovery in ways that help avoid costly hospital admissions or readmissions. As noted by NCTA, however, rural customers often cannot afford all of the costs associated with remote monitoring - the hardware, software, monitoring service and broadband connection. By further supporting rural broadband buildout, the Commission will ensure that remote monitoring services are available to those who need them most.

### III. CONCLUSION

For the reasons stated above, OTT Communications encourages the Commission to open a Rulemaking to review the RHC Program and to specifically consider additional funding for the broadband services needed for the remote monitoring program.

Respectfully submitted,

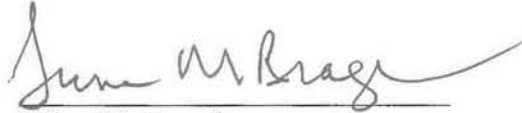
A handwritten signature in black ink, appearing to read "Trina M. Bragdon", written over a horizontal line.

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Dated: January 14, 2016

**Certificate of Service**

I, Trina M. Bragdon, certify that on January 14, 2016, I filed the above Comments of OTT Communications with the Federal Communications Commission via the Electronic Comment Filing System.

A handwritten signature in cursive script, reading "Trina M. Bragdon", written over a horizontal line.

Trina M. Bragdon